



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NEW YORK, 10007

April 20, 2021

Colleen S. Liddell  
Ford Motor Company  
290 Town Center Drive, Suite 800  
Dearborn, MI 48126

Re: Response to Comments to draft Operable Unit Two Remedial  
Action Work Plan; Ringwood Mines/Landfill Site

Dear Ms. Liddell:

The U.S. Environmental Protection Agency (EPA) and the New Jersey Department of Environmental Protection (NJDEP) have completed review of the March 19, 2021 Response to Comments (Response) to the December 2020 draft Operable Unit Two Remedial Action Work Plan (RAWP) for the Ringwood Mines/Landfill Site. EPA and NJDEP believe that the proposed revisions to the RAWP detailed in the Response may adequately address the Agencies' concerns regarding the draft RAWP. However, EPA has received comments on the Response from the Ringwood Environmental Commission and a Borough of Ringwood resident, which have been attached to this letter.

In accordance with the August 2020 Consent Decree, Civil Action No. 2:19-cv-12157, a revised RAWP which incorporates the revisions detailed in the Response should be submitted to EPA and NJDEP within twenty-one (21) days of the date of this letter. Furthermore, concerns expressed in the attached comments should be taken into consideration during revision of the RAWP.

If you have any questions concerning this matter, please call.

Sincerely yours,

Joseph A. Gowers, Project Manager  
New Jersey Remediation Branch

Attachments

cc: C. Coslett, de maximis  
D. Zaliwski, NJDEP  
L. Dodge, Excel  
S. Heck, Borough of Ringwood



RE: Ringwood Superfund Site OU-2 RAWP  
Ringwood Environmental Commission Concerns on Response to RAWP Comments

Monday, April 19, 2021

Mr. Gowers:

Thank you for the opportunity to express our concerns on the response to our comments on the Ringwood Superfund Site OU-2 RAWP.

#### Response to Concern 1.A

1. Thank you for partially addressing our concern. The language "fencing will be maintained" does not address the fact that entire sections of fencing are missing or severely damaged. Fencing needs to be repaired in addition to maintaining the functional sections. Language similar to the response to 1.C should be in this response.
2. What barrier do you intend to use to block ATV access and how will those barriers be removed after construction?

#### Response to Concern 1.B

1. Please acknowledge that one of the primary reasons for selecting this remedy and the original full removal was the stated opinion that fencing would be inadequate to keep trespassers out of OCDA. Why is that not acknowledged in the work plan?
2. Will cameras cover the entire perimeter of fencing?
  - a. What type of cameras will be used?
  - b. How will they be connected to the network?
  - c. Where will the actual monitoring take place?
3. What is the plan if the cameras do detect activity at the site during off hours? Who will respond?

For the protection of the residents and the work equipment onsite, consider having security there 24/7 during the construction phase. Considering the scope of work, it is very possible that there are additional sinkholes and dangers during construction that local residents will be unaware of. Considering the cost savings of the current plan, this extra level of protection could save lives with little added cost.

#### Response to Concern 2.A

Page 225 of 1279 should be updated to 15 MPH to avoid the conflict with the answer stated in your response. That page details the Vendor Orientation for the

delivery trucks and states "Speed limit on SITE is 5 MPH." The information should be consistent across all documents to be clear and unambiguous.

#### Response to Concern 2.C

The conflicts were made clear above. Please update page 225.

#### Response to 3.A

1. The Arcadis drawings from 2009 clearly indicate drums and paint sludge located beneath the waterline. We do not believe any action was taken to remediate this since that report came out. We have attached the images from the report. Please amend your response to remove the uncertainty in it. There are known drums and paint sludge below the waterline and the response should not falsely claim that there may be none. This is a known fact.
2. You should definitely anticipate moving a larger volume of water than can simply be pumped out at the site. When this water is brought up from the ground it is critical that the responses to section 1, security, also be addressed by doing everything possible to prevent humans from coming into contact with this water. Please include a plan for having to move the additional water that you are not anticipating or explain why the attached drawings are not taken into consideration.

#### Response to 3.B

Considering the scope of sludge and drums below waterline as described above, how will you be able to lower the water table while the water stays onsite? This seems akin to pumping water out of a sink onto a drying rack that drains back into the sink. If there is a place that can be saturated enough to take up this water, how do we know that some of it will not travel outside the area and downstream? 1,4 dioxane is very water soluble, so it will travel wherever the water goes.

#### Response to 3.C

Considering the years of water testing, it is frankly callous to even mention that there is no documented dumping of hazardous wastes. We know that much of the dumping in the area was illegal, so the mention of a lack of documents does not seem to have any point. The material is there, what is the purpose of mentioning that you are not aware of any documentation? How does this statement fit into the precautions that will be taken and what influence does it bear on this document?

#### Response to 3.D

Thank you for the detailed response. Is there any consideration given for changes in wind direction overnight? The plan seems to only account for activities during work hours, but the potential for pumping water 24/7 could release contaminants throughout the night.

#### Response to 4.B

Again, we would like a detailed plan on how the information will be communicated to the community. Details on the transmission of information as well as where information will be posted for residents to review. We appreciate the intention of communication, but would like to know the specific channels that will be used. Community meetings would go a long way to easing the unknowns that will add stress to an already difficult situation for the residents.

#### Response to 4.C

1. To be clear, is your response to be interpreted that residents and Borough employees cannot give a stop work order if they identify a major issue?
2. When "communicated immediately to the provided points of contact" what happens to the concern from there and how quickly can the point of contact issue a stop work order?

#### Response to 5.A

1. Thank you for the response. How many projects has de maximis and RECON worked on together? Their close relationship does call into question the effectiveness of de maximis to objectively oversee RECON. Tetra Tech is owned by de maximis, so there is also a connection.
2. Is the scope and frequency of the Army Corps of Engineers oversight known?

#### Response to 5.B

We will look forward to reviewing the updated section 8.2.

#### Response to 5.C

Does the evaluation discussed in this response include the possibility that Peter's Mine area will be pumping water onsite? We still do not understand how the water will be kept onsite while lowering the water table, let alone how a significant storm would not wash that water offsite.

#### Response to 5.D

The Peter's Mine site appears maxed out with all the staging areas given in the plan. Providing room for trucks to navigate through the weigh station up there seems difficult. It will also cause unnecessary travel deeper into the community from the Canon Mine site and the OCDA sites. Please consider a weigh station location that does not necessitate additional travel into the heart of the community.

#### Response to 6.A

1. Where are the results of the endangered species inspections?
2. Will they be made public?

#### Response to 6.B

We will look forward to receipt of the Habitat Best Management Practices Manual. Please provide an ETA for receipt of this.

#### Response to 7.A

As stated above, the community should be made aware of those specific modes of communication of information. A communications hub would be ideal so that curious residents have a resource to look back on. Currently, it seems mailings are the only source of information.

**The Commission would be happy to host an online resource for residents to be able to review documents.**

Thank you again for allowing the Ringwood Environmental Commission to share concerns. This has been a helpful exchange of ideas and we appreciate the consideration given in the responses. By working together, we can assure that the maximum effort is made to minimize the impacts on the residents, their children, and the environment.

Regards,

A handwritten signature in blue ink, appearing to read 'Thomas Conway', with a stylized flourish at the end.

Thomas Conway  
Chair, Ringwood Environmental Commission



Date: Time : Mon, 18 Feb 2008 - 2:07pm  
Path: Name : G:\Drafting\RINGWOOD\PAR-R\S\Peters Mine Investigation\FIG 03 - XS Test Trench 01.dwg - Layout Tab : TT-01 22X17 H

Acad Version : R16.2s (LMS Tech)  
User Name : jrgonzalez

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REV. ISSUED DATE DESCRIPTION

SEAL



1 International Boulevard  
Mahwah, NJ 07495-0025  
Tel: 201-684-1410 Fax: 201-684-1420  
www.arcadis-us.com

PROJECT TITLE

INVESTIGATION OF PETERS MINE  
RINGWOOD MINE/  
LANDFILL SITE  
RINGWOOD, NEW JERSEY

PROJECT MANAGER  
E. ZIMMERMAN

DEPARTMENT MANAGER  
E. CARMAN

LEAD DESIGN PROF.  
J. SEIER

CHECKED BY  
J. SEIER

SHEET TITLE

TEST TRENCH 1 (TT01)  
CROSS SECTION (A - A')

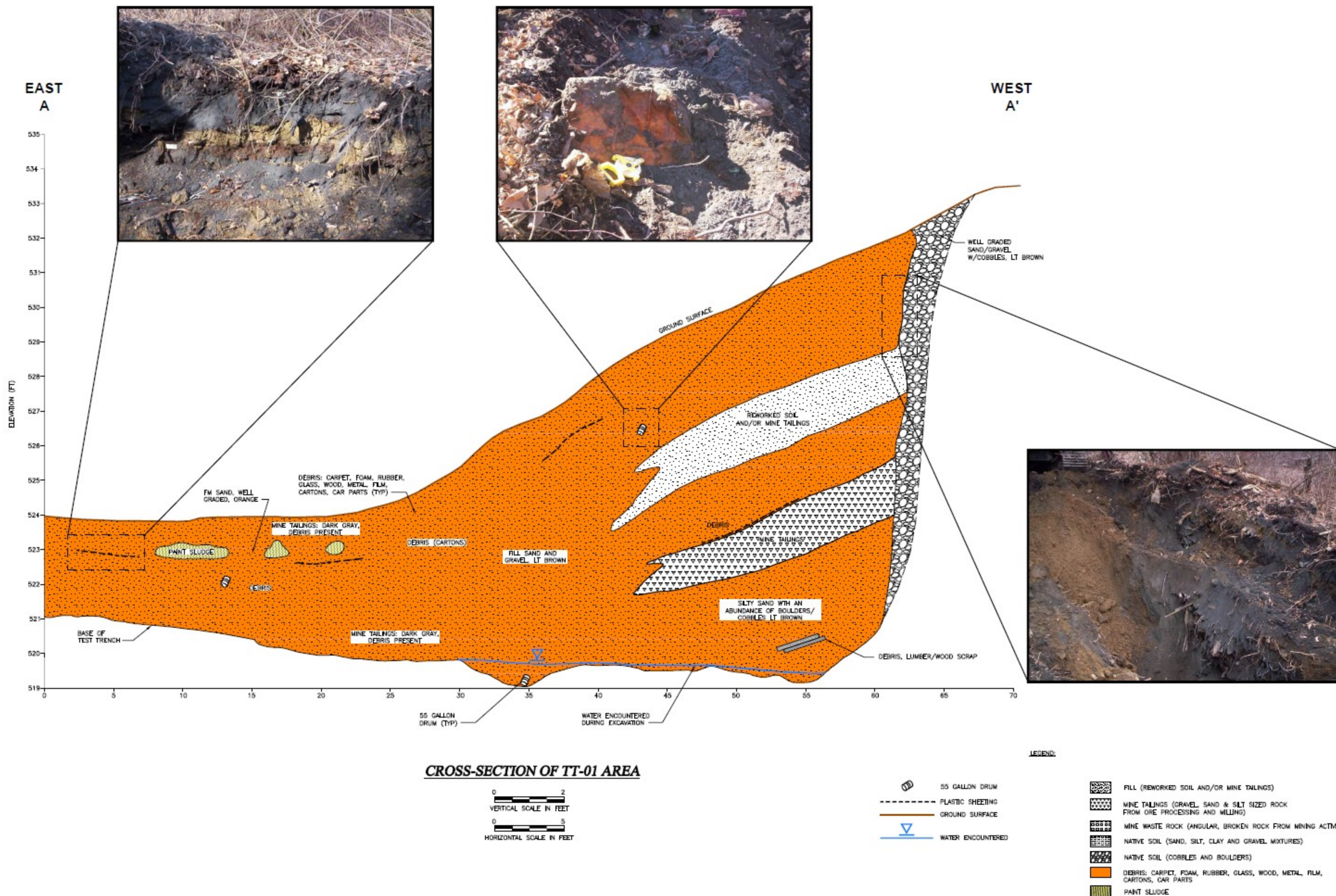
TASK/PHASE NUMBER  
NJ001

DRAWN BY  
J. GONZALEZ

PROJECT NUMBER  
NJ000604.0001

DRAWING NUMBER

3



R2-0001110



Date: Time : Mon, 18 Feb 2008 - 2:10pm  
Path Name : G:\drafting\RINGWOOD\BAR-SI\Peters Mine Investigation\FIG 04 - XS Test Trench 02.dwg - Layout Tab : TT-02 (22X17 H)

Acad Version : R16.2s (LMS Tech)  
User Name : jgonzalez

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E. ZIMMERMAN

DEPARTMENT MANAGER  
E. CARMAN

SHEET TITLE

TEST TRENCH (TT02)  
CROSS SECTION (B - B')

LEAD DESIGN PROF.  
J. SEIER

CHECKED BY  
J. SEIER

TASK/PHASE NUMBER  
NJ001

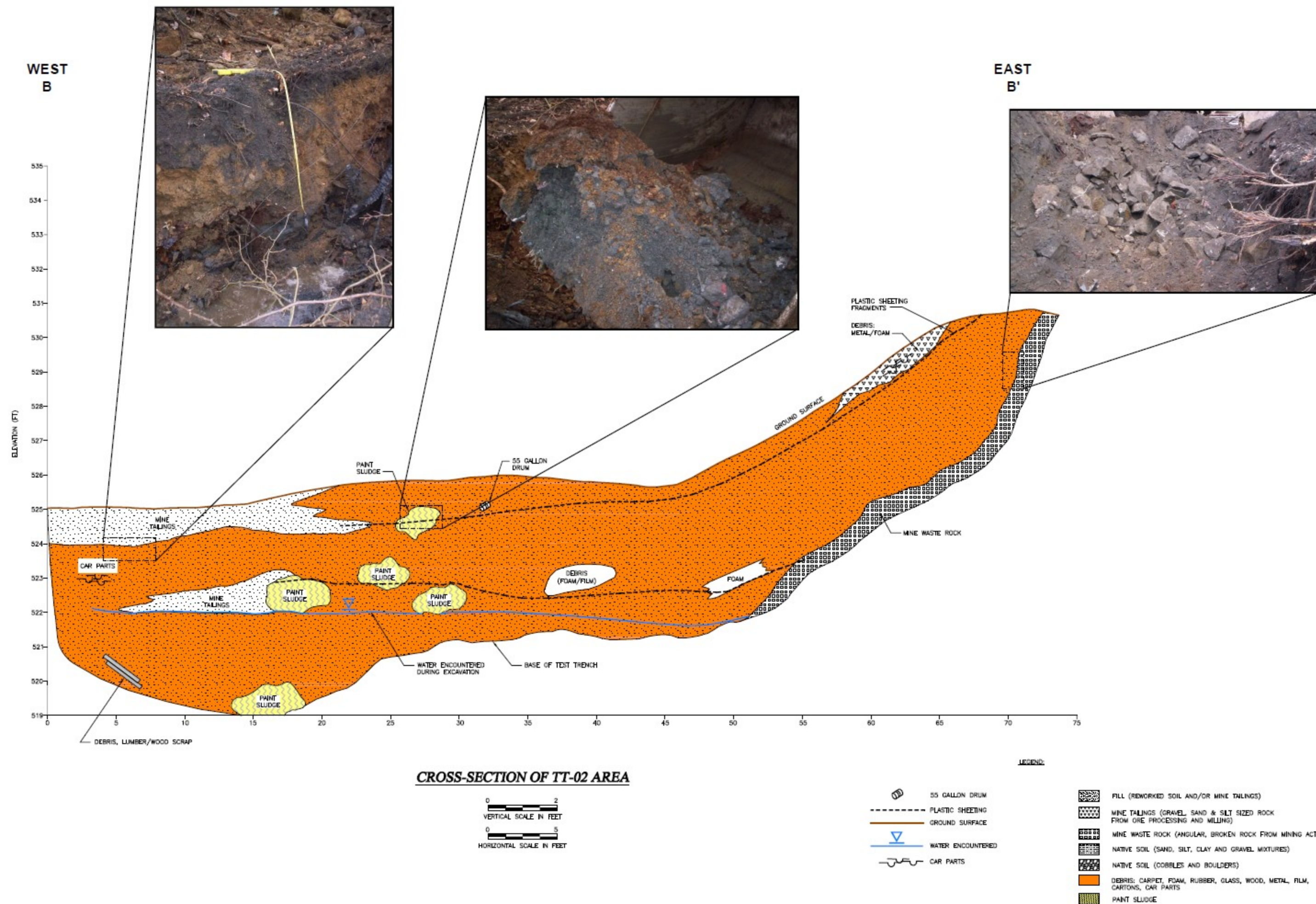
DRAWN BY  
J. GONZALEZ

PROJECT NUMBER

NJ000604.0001

DRAWING NUMBER

4





**From:** [Jim Oilcan](#)  
**To:** [Gowers, Joe](#)  
**Cc:** [Scott Heck](#); [Thomas Conway](#)  
**Subject:** Re: Ringwood Mines/Landfill site - Response to Comments to December 2020 draft Operable Unit 2 Remedial Action Work Plan  
**Date:** Monday, April 19, 2021 11:05:58 AM  
**Attachments:** [RECON vs NAAQS PM levels.pdf](#)

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Joe,

### AIR QUALITY

I am still concerned with the effects of the construction on the nearby residents. RECON's responses to my questions concerning dust particles per NAAQS are not satisfactory.

- a) NAAQS requires separate measurement of PM10 and PM2.5 since there are separate allowable levels. Recon's response that PM10 includes both is correct, but that does not allow determination of whether PM2.5 levels are within the allowable limits, which are much lower than PM10. (See attached excerpt from EPA NAAQS and CAMP page 8.)
- b. NAAQS PM10 allowable level of 150 micrograms per cubic meter average over 24 hours, **which cannot be exceeded more than once per year.** The CAMP sets the PM10 action level at 150, which is based on a hand-held 15 minute sample. There is no information of frequency of sampling, nor how they plan to measure nights and weekends.
- c. The NAAQS PM2.5 allowable level is 12 micrograms per cubic meter annual mean, averaged over 3 years. Since PM2.5 is not measured, there is no determination of whether it is exceeded.
- d. Why are hand-held measurements taken, and not air monitoring stations which operate 24 hours per day? These are appropriate outside the work area.
- e. CAMP appendix A, Table 1 - Footnote c "Exposure basis for this project: 5 days per week, 10 hours per day".  
These are OSHA levels for "healthy workers", not NAAQS levels for the public, including sick people and children who live there 24 hours per day, 7 days per week
- f. CAMP appendix A, Table 2 - Footnote c- same as above.

JOE, PLEASE HAVE EPA STAFF REVIEW THE PROPOSED CAMP ACTION LEVELS AND MEASUREMENT PLAN TO DETERMINE IF THEY ARE APPROPRIATE FOR THE RESIDENTIAL NEIGHBORS.

### DUST CONTROL ON STREETS

The CAMP only addresses dust control within the work site. However the trucks can carry dust onto the residential streets.

The CAMP mentions a "water truck", but not a street sweeper/vacuum truck.

The local streets should be swept/vacuumed periodically as needed, and at the end of each work shift.

FYI - At the quarry in Pompton Lakes, the residential streets are swept and wet every few hours to control dust.

### LOCATIONS OF RESIDENCES NEAR WORK SITES

My comment was to show the location of the residences near the work site for wind-born dust. RECON replied that they do that.

This is correct only for one residence near Cannon Mine Pit - but the home is not highlighted



and lost against the contour lines.

Provide three additional drawings, using smaller scale if necessary, to show the nearby residences. Highlight them so they are easily recognized on the drawings.

Thank You,  
Jim Guinan,  
Ringwood Rersident